

Serial No. 10/707,764  
Filed: 01/09/04  
Page 9 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

### **REMARKS**

Claims 1-32 were in the application as examined. By this amendment, claims 1-19, 21-28, and 30-32 are amended; claims 20 and 29 are canceled; and new claims 33-42 are added. Additionally, the specification has been amended to correct clerical errors. It is respectfully submitted that no new matter is added to the application by these amendments. Reconsideration and reexamination is respectfully requested.

### **Claim Rejections – 35 U.S.C. § 102**

Claims 1-4, 14, 18, and 27 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,837,665 to Young (Young '665). This rejection is respectfully traversed. Young '665 does not anticipate these claims because each and every limitation in the claims is not found in Young '665.

Claim 1 as amended calls for an aqueous carpet cleaning composition to comprise a terpene hydrocarbon solvent, one or more surfactants including at least one nonionic surfactant, an anti-soil component, an anti-stain component, water, and a pH adjusting agent to maintain the pH of the aqueous carpet cleaning composition between about 8.5 and 9.5. The at least one nonionic surfactant is present in amount sufficient to stabilize the terpene hydrocarbon solvent, and the pH range helps to stabilize the carpet cleaning composition so that the terpene hydrocarbon solvent, the anti-soil component, and the anti-stain component remain in solution.

Young '665 discloses an aqueous spot cleaner comprising an alkali metal polyphosphate or tripolyphosphate, an alkali metal alkylaryl sulfonate, a solvent that can include Limonene, and water. However, Young '665 does not disclose an aqueous composition having an anti-soil component and an anti-stain component, as required by claim 1.

The Examiner has held that "lacking a definition or Markush group to describe what is meant by these components [anti-soil and anti-stain], just about any detergent ingredient could be considered to have anti-soil and anti-stain properties." On the contrary, anti-soil and anti-stain components are well known terms in the carpet cleaning industry to which the invention pertains. See, for example, U.S. Patent No. 5,534,167 to Billman (Billman '167), Col 4, lines 24-26,

Serial No. 10/707,764

Filed: 01/09/04

Page 10 of 21

Examiner: Charles I. Boyer

Group Art Unit: 1751

col.13, lines 44-64 (anti-soil); col. 3, lines 11-24, col. 14, line 62- col. 15, line 6 (anti-soil).

These ingredients have particular properties for imparting soil resistance and stain resistance to the carpet following application and possibly removal of the carpet cleaning composition. Thus, the Examiner's assertion is unsupported and inaccurate. Young '665 does not disclose an anti-soil component or an anti-stain component.

Further, Young '665 does not disclose an aqueous composition having a nonionic surfactant and does not specify a pH range for the aqueous composition, as required by claim 1. The nonionic surfactant and the pH range between 8.5 and 9.5 maintain the elements of claim 1 in a stable solution. The problem of maintaining a terpene hydrocarbon solvent, an anti-soil component, and an anti-stain component in a stable solution is addressed in the background of the invention in the present application, and the Applicant has solved this problem with the nonionic surfactant and pH range, which are not found in Young '665. Because Young '665 does not disclose every element of claim 1, claim 1 is allowable over Young '665.

Claims 2-4, 14, 18 and 27 depend from claim 1 and are allowable over Young '665 for the same reasons as claim 1.

In addition, claim 4 specifies a composition range of from greater than about 0.1 to about 5 wt. % for the d-limonene. In Young '665, the Limonene is said to be present in "trace amounts" (col. 2, line 16), and examples show the Limonene present at 0.03 wt% and ranging from a trace to 0.1 wt. %. Thus, Young '665 does not disclose d-limonene having a concentration in the range specified by claim 4, and thus does not anticipate claim 4.

Claim 18 further requires the concentration of the one or more surfactants, which includes the at least one nonionic surfactant, to be between about 5.5 and 7 wt. %. Young '665 does not disclose the nonionic surfactant, as discussed above, and, therefore, does not disclose the claimed range for the one or more surfactants. It follows that claim 18 is not anticipated by Young '665 independently of and in addition to the distinctions of claim 1 over Young '665.

Claims 1-3 and 14 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,767,874 to Gonzalez (Gonzalez '874). This rejection is respectfully traversed.

Serial No. 10/707,764  
Filed: 01/09/04  
Page 11 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

Gonzalez '874 discloses a cleaning composition comprising a solvent, such as d-limonene, anionic and nonionic surfactants, and water. Gonzalez does not disclose any anti-soil component or anti-stain component and does not specify a pH adjusting agent to maintain a certain pH range for stabilizing the cleaning composition. Thus, Gonzalez '874 does not anticipate claim 1, and claim 1 is allowable over Gonzalez '874.

Claims 2-3 and 14 depend from claim 1 and distinguish over Gonzalez '874 in the same manner as claim 1.

Claims 1-3 and 14 have been further rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,580,495 to Young (Young '495). This rejection is respectfully traversed.

Young '495 discloses an aqueous detergent composition comprising an anionic surfactant, builders, solvents, and d-limonene as a fragrance, and the composition is said to have a pH of above 10 and preferably 10-13. The pH range of Young '495 is outside the 8.5 to 9.5 range as required by claim 1 to keep the carpet cleaning composition in solution. Further, Young '495 does not disclose a nonionic surfactant, anti-soil component, or anti-stain component as required by claim 1. It therefore follows that claim 1 is not anticipated by Young '495.

Claims 2, 3 and 14 depend from claim 1 and are not anticipated by Young '495 for the same reasons as claim 1.

Claims 1-3 and 14 have been further rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,620,937 to Dellutri (Dellutri '937). This rejection is respectfully traversed.

Dellutri '937 discloses a gelatinous cleaning composition with a pH of 5.5 and comprising d-limonene, stearic and oleic acids, nonionic detergents, and water. Claim 1 of the present application requires a pH adjusting agent to maintain the pH in the range of 8.5 to 9.5, an anti-soil component, and an anti-stain component, which are elements not disclosed in Dellutri '937. Thus, claim 1 is not anticipated by Dellutri '937 and is allowable over Dellutri '937.

Claims 2, 3 and 14 depend from claim 1 and are not anticipated by Dellutri '937 for the same reasons as claim 1.

Serial No. 10/707,764  
Filed: 01/09/04  
Page 12 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

Claim 14 further specifies that the one or more surfactants comprises at least one anionic surfactant. Dellutri '937 does not disclose the use of an anionic surfactant and therefore does not anticipate claim 14. Claim 14 is independently allowable over Dellutri '937 in addition to being allowable over Dellutri '937 for the same reasons as claim 1.

Claims 1-3, 14, and 27 have been further rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,533,487 to Jones (Jones '487). This rejection is respectfully traversed.

Jones '487 discloses a process for producing a d-limonene cleaning agent. The process includes several steps that involve the use of d-limonene, anionic and ionic surfactants, a buffer, and water. However, Jones '487 does not disclose an anti-soil or an anti-stain component, as required by claim 1, nor does Jones '487 disclose a pH range for the disclosed d-limonene cleaning composition. Jones '487 only discusses "neutralizing" the high acid content of the d-limonene. A neutral pH is around 7, not between about 8.5 and 9.5, as required by claim 1. Furthermore, claim 1 specifies that the one or more surfactants comprises a *nonionic* surfactant, while Jones '487 only discloses anionic and ionic surfactants. Jones '487 does not anticipate claim 1. Claim 1 is not anticipated by Jones '487.

Claims 2-3, 14, and 27 are dependent on claim 1 and are not anticipated by Jones '487 for the same reasons as claim 1.

Claims 1-6, 8, and 14-16 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,602,090 to Mellikyan et al. (Mellikyan '090). This rejection is respectfully traversed.

Mellikyan '090 discloses an aqueous cleaning composition comprising d-limonene, hydrogen peroxide, a nonionic surfactant in the form of an alkyl ethoxylate having 12 to 15 carbon atoms, two anionic surfactants, water, and a thickening agent in the form of a polyacrylate-polyalcohol polymer. Mellikyan '090 does not disclose a pH adjusting agent to maintain the pH in the range of 8.5 to 9.5, an anti-soil component, and an anti-stain component, all as required by claim 1. Mellikyan '090 does not disclose a pH adjusting agent, much less a desired pH range. The polyacrylate-polyalcohol polymer disclosed in Mellikyan '090 is a

Serial No. 10/707,764  
Filed: 01/09/04  
Page 13 of 21

Examiner: Charles L. Boyer  
Group Art Unit: 1751

thickening agent to increase the viscosity of the cleaning composition, not an anti-soil or an anti-stain component, as required by claim 1. Even if, *arguendo*, the polyacrylate-polyalcohol polymer could be considered to be an anti-soil component, Mellikyan '090 still lacks the anti-stain component. It therefore follows that claim 1 is not anticipated by Mellikyan '090.

Claims 2-6, 8 and 14-16 depend from claim 1 and are not anticipated by Mellikyan '090 for the same reasons as claim 1.

Further, claim 8 depends from claim 1 and specifies that the anti-soil component is an acrylate copolymer. Again, the polyacrylate-polyalcohol polymer in Mellikyan '090 is a thickening agent to increase the viscosity of the cleaning composition, not an anti-soil component, as required by claim 8. Thus, claim 8 is not anticipated by Mellikyan '090 independently in addition to distinguishing over Mellikyan '090 for the same reasons as claim 1.

Claim 16 further specifies that the at least one nonionic surfactant comprises a blend of two alkoxylated lineal alcohols in addition to the linear primary alcohol ethoxylate recited in claim 15. Mellikyan '090 discloses only one nonionic surfactant and does not discuss a blend of two alkoxylated lineal alcohols. Thus, claim 16 is not anticipated by Mellikyan '090 and is patentable over Mellikyan '090 independently and based on its dependency from claim 1.

Claims 1-3 and 14 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,962,391 to Oldenhove (Oldenhove '391). This rejection is respectfully traversed.

Oldenhove '391 discloses a disinfecting aqueous cleaning composition comprising a non-polar solvent or weakly polar solvent, such as d-limonene, hydrogen peroxide, surfactants selected from the group of nonionics, anionics, and others, and, optionally, a pH adjusting agent. However, Oldenhove '391 does not discuss specific pH ranges or values and does not suggest incorporating an anti-soil or anti-stain component into the cleaning composition, as cited by claim 1. For these reasons, claim 1 is not anticipated by Oldenhove '391.

Claims 2, 3, and 14 are dependent on claim 1 and are not anticipated by Oldenhove '391 for the same reasons as claim 1.



Serial No. 10/707,764  
Filed: 01/09/04  
Page 14 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

Claims 1-4, 14, 18, and 27 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,942,482 to Zocchi (Zocchi '482). The rejection is respectfully traversed.

Zocchi '482 discloses an acaricidal carpet cleaning composition comprising a perfume that can contain varying amounts of essential oils or terpenes, an anionic-nonionic surfactant mix, water, and, optionally, a pH adjusting agent. Zocchi '482 does not disclose the use of an anti-soil component or an anti-stain component, as required by claim 1. Additionally, Zocchi '482 lists several exemplary compositions, only one of which has a pH in the range of 8.5 to 9.5. This example, Example Mr. Proper (col. 13, line 55 – col. 14, line 24), however, does not include the anti-soil or anti-stain component. Thus, claim 1 is not anticipated by Zocchi '482.

Claims 2-4, 14, and 18 depend from claim 1 and are not anticipated by Zocchi '482 for the same reasons as claim 1.

#### **Claim Rejections – 35 U.S.C. § 103**

Claims 1-32 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Mellikyan '090 in view of Billman '167. This rejection is respectfully traversed.

Mellikyan '090 has been discussed above. Billman '167 discloses a carpet cleaning and restoring composition comprising ethylene glycol n-hexyl ether (EGHE) as a solvent, a surfactant component of nonionic surfactants, anionic surfactants, or mixtures thereof, an optional co-solvent, an anti-soil component, an anti-stain component, and water, with a final pH from about 6 to about 10 and preferably from about 6 to about 9.

The alleged combination of Mellikyan '090 in view of Billman '167 is traversed. There is no basis for making the alleged combination and the examiner has given none. There is no suggestion for incorporating the disclosure of Billman '167 in the Mellikyan '090 disclosure. Therefore, the Examiner has not raised a *prima facie* case of obviousness.

In a § 103 rejection, the Examiner has the initial burden of establishing a *prima facie* case of obviousness based upon the prior art references. *In re Fritch*, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). Further, a rejection of claims is improper when the requisite teaching or suggestion to

Serial No. 10/707,764  
Filed: 01/09/04  
Page 15 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

combine the teachings of the prior art references is absent. *In re Bell*, 991 F.2d 781, 26 U.S.P.Q.2d 1529 (Fed. Cir. 1993). In other words, "obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992)." M.P.E.P. § 2143.01 The showing of combinability, in whatever form, must be "clear and particular." *In re Dembiczak*, 175 F.3d 994, 50 USPQ 2d 1614 (Fed. Cir. 1999)

The Examiner cannot properly take one reference lacking certain claim elements and combine it with another reference having the lacking elements without some rational basis. Picking and choosing elements from references and combining them to meet a claim construction does not satisfy the standards of 35 U.S.C. § 103.

Applying the decisional standards to the Examiner's rejection under 35 U.S.C. § 103, there must be some suggestion for the alleged combination of Mellikyan '090 in view of Billman '167. The alleged combination of Mellikyan '090 in view of Billman '167 must fail because there is no suggestion in Mellikyan '090 or Billman '167 that would warrant the combination. In fact, Billman '167 teaches against making the alleged combination by stressing the importance of using EGHE as the main solvent in the composition (see col. 4, lines 1-8) with the anti-soil and anti-stain components. Alternatively, it must be within the knowledge generally available to one of ordinary skill in the art to make the combination. The Examiner has made no showing as to why it would be obvious to one of ordinary skill in the art to add the anti-soil and anti-stain components of Billman '167 to the composition of Mellikyan '090, especially because in such a combination, the d-limonene and the anti-soil and anti-stain components would not remain in solution. Rather, the components and pH of the claimed composition have been selected to solve the problem of keeping the d-limonene and the anti-soil and anti-stain components in a stable solution. One must show a plausible connection between the two references based on the teaching of the references and not by conclusory statements that are nothing more than a demonstration of classic hindsight argument. It is therefore submitted that the alleged

Serial No. 10/707,764  
Filed: 01/09/04  
Page 16 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

combination of Mellikyan '090 in view of Billman '167 is inappropriate and cannot tenably be made.

However, even if the alleged combination were to be made, however untenably, it still would not reach Applicants' claimed invention as defined in claim 1. The alleged combination would result in a composition comprising, from Mellikyan '090, a terpene, anionic and ionic surfactants, hydrogen peroxide, and water and, from Billman '167, an anti-soil component and an anti-stain component. However, there is no teaching as to how to maintain the d-limonene, the anti-soil and anti-stain components in solution, as required by claim 1. Further, the pH of the alleged combination cannot be ascertained from the individual references. D-limonene and 35% hydrogen peroxide, which is the grade shown in the examples of Billman '167, both have an acidic pH, and the alleged combination does not include a pH adjusting agent to adjust the pH to basic and to specifically between about 8.5 and 9.5, as recited in claim 1.

The Examiner asserts, without support, that the inclusion of additives, such as pH adjusters and defoaming agents, is well known to those of ordinary skill. That may be true but the Examiner has misconceived the issue. The issue is whether the problem to be solved by these components and the solution that Applicant has found to this problem are well known in the art. Applicant believes that the problem to be solved by these components and the solution that Applicant has found to this problem are not known in the art and certainly not disclosed in the cited references. If the Examiner believes otherwise, the Examiner is respectfully requested to cite authority to show that the problem solved by the claimed additives is known in the art in accordance with MPEP § 2144.03. In view of the foregoing, it is submitted the claim 1 patentably defines over any alleged combination of Mellikyan '090 in view of Billman '167.

Claims 2-27 depend from claim 1 and are patentable over the alleged combination of Mellikyan '090 in view of Billman '167 for the same reasons set forth above with respect to claim 1.

Further, claim 7 defines over the alleged combination of Mellikyan '090 in view of Billman '167 by specifying that the anti-soil component is a compound containing polysiloxane derivatives. The alleged combination of Mellikyan '090 in view of Billman '167 does not



Serial No. 10/707,764  
Filed: 01/09/04  
Page 17 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

include a polysiloxane derivative. Thus, claim 1 is independently patentable over the alleged combination of Mellikyan '090 in view of Billman '167 in addition to being patentable over the alleged combination for the same reasons as claim 1.

Claim 8 further defines over the alleged combination of Mellikyan '090 in view of Billman '167 in that it requires the anti-soil component to be an acrylate copolymer. The alleged combination of Mellikyan '090 in view of Billman '167 does not include an acrylate copolymer anti-soil component. As pointed out above, the polyacrylate-polyalcohol polymer in Mellikyan '090 is a thickening agent to increase the viscosity of the cleaning composition, not an anti-soil or an anti-stain component, as required by claim 8. For these reasons, claim 8 is patentable over the alleged combination of Mellikyan '090 in view of Billman '167 independently as well as the same reasons as claim 1.

Claim 12 further defines over the alleged combination of Mellikyan '090 in view of Billman '167 by specifying that the anti-stain component concentration is between about 4 and 10 wt. %. In the alleged combination, the concentration of the anti-stain component is not in this range. The Billman '167 patent, which contributes the anti-stain component to the alleged combination, provides examples having 0.5 wt. % and 2 wt. % anti-stain component. The specification of Billman '167 further states that "the polymer component, which can include the stain-blocking polymer, is generally present in an amount from about 0.1% to about 7.0%" (col. 5, lines 30-32). It is not clear from this statement what the actual concentration of the stain-blocking polymer is and whether the concentration of the stain-blocking polymer of the polymer component is within the range recited by claim 12. Thus, claim 12 is patentable over the alleged combination of Mellikyan '090 in view of Billman '167 independently and for the same reasons as claim 1.

In the Office Action, the Examiner asserts, without support, that "selection of appropriate amounts [of ingredients] would have been *prima facie* obvious because the general conditions of a claim are disclosed in the prior art, it is not inventive to discover the optimum or workable ranges by routine experimentation," citing *In re Aller*, 220 F2d 454 (CCPA 1955). On the contrary, the relative amounts of the various components of the claimed compositions are

Serial No. 10/707,764  
Filed: 01/09/04  
Page 18 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

carefully selected to solve the problem discussed in the specification and produce a stable solution. This problem is not recognized in the cited references and thus would not be addressed by those working in the art with knowledge of the cited references. In accordance with MPEP § 2144.03, Applicants respectfully request the Examiner to cite a reference that teaches or suggests the concentration ranges as claimed in all relevant claims.

Claim 13 depends from claim 12 and calls for the concentration of the anti-stain component to be about 8 wt. %. The alleged combination of Mellikyan '090 in view of Billman '167 does not include an anti-stain component at this concentration. Thus, claim 13 is independently patentably distinct from the alleged combination Mellikyan '090 in view of Billman '167 and is also patentable over this alleged combination for the same reasons as claims 1 and 12.

Claim 16 depends from claim 15 and further requires the at least one nonionic surfactant to comprise, in addition to the linear primary alcohol ethoxylate in claim 15, a blend of two alkoxyated lineal alcohols. The alleged combination of Mellikyan '090 in view of Billman '167 does not include a blend of two alkoxyated lineal alcohols nor does it include this particular combination of nonionic surfactants. Thus, claim 16 is independently patentable over the alleged combination of Mellikyan '090 in view of Billman '167 and is patentable over the alleged combination of Mellikyan '090 in view of Billman '167 for the same reasons as claims 1 and 15.

Claim 17 further defines over the alleged combination Mellikyan '090 in view of Billman '167 by specifying that the at least one anionic surfactant comprises an alkyl naphthalene sodium sulfonate. Neither the compositions of Mellikyan '090 and Billman '167 nor the alleged combination of Mellikyan '090 in view of Billman '167 include an alkyl naphthalene sodium sulfonate. Although Mellikyan '090 does list alkyl sulfonates in a list of suitable anionic surfactants, it does not disclose alkyl naphthalene sodium sulfonate. It therefore follows that claim 17 is independently patentable over the alleged combination of Mellikyan '090 in view of Billman '167.

Claim 18 further distinguishes of the alleged combination of Mellikyan '090 in view of Billman '167 in calling for the concentration of the one or more surfactants to be in the range

Serial No. 10/707,764  
Filed: 01/09/04  
Page 19 of 21

Examiner: Charles L. Boyer  
Group Art Unit: 1751

between about 5.5 and 7 wt. %. In Mellikyan '090, the five examples have surfactant concentrations of less than 4 wt. % or greater than 19 wt. %, while the surfactant concentration in the Billman '167 example is 2.25 wt. %, with the specification stating that the surfactant component is typically present in an amount from about 0.25% to about 5.0% (col. 6, lines 39-40). Thus, the alleged combination of Mellikyan '090 in view of Billman '167 does not have a surfactant concentration of between about 5.5 wt. % and 7 wt. %, as required by claim 18. For this reason, claim 18 is independently patentable over the alleged combination in addition to being patentable over the alleged combination for the same reasons as claim 1.

Claim 19 depends from claim 18 and distinguishes over the alleged combination of Mellikyan '090 in view of Billman '167 for the same reasons as claim 18. Further, claim 19 narrows the surfactant concentration to about 5.5 wt. %. This concept is not disclosed in the alleged combination of Mellikyan '090 in view of Billman '167. The arguments presented above with respect to claim 18 apply equally to claim 19. Therefore, claim 19 is allowable over the alleged combination of Mellikyan '090 in view of Billman '167 for the same reasons as claim 18 as well for its recitation of the preferred surfactant concentration.

Claim 21 further narrows the pH of the carpet cleaning composition to about 9.0. This pH helps to keep the components of the composition in a stable solution, and, as discussed above. The pH of the alleged combination cannot be ascertained from the individual references. Thus, the alleged combination does not reach the carpet cleaning composition of claim 21, and claim 21 is allowable over the alleged combination of Mellikyan '090 in view of Billman '167 independently in addition to being allowable over the alleged combination for the same reasons as claim 1.

Claim 22 further distinguishes of the alleged combination of Mellikyan '090 in view of Billman '167 because it identifies the pH adjusting agent as an alkali metal hydroxide. Neither Mellikyan '090, Billman '167 nor the alleged combination discloses the use of an alkali metal hydroxide as a pH adjusting agent. It therefore follows that claim 21 is independently patentable over the alleged combination of Mellikyan '090 in view of Billman '167 as well as for its dependency from claim 1.

Serial No. 10/707,764  
Filed: 01/09/04  
Page 20 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

Claim 23 and 24 provide concentration ranges for the pH adjusting agent. The alleged combination does not include a pH adjusting agent, much less any exemplary concentration ranges for a pH adjusting agent. Thus, claims 23 and 24 are patentable over the alleged combination of Mellikyan '090 in view of Billman '167 independently of claim 1.

Claim 25 incorporates an anti-foam agent into the carpet cleaning composition. Neither Mellikyan '090, nor Billman '167 nor the alleged combination of Mellikyan '090 in view of Billman '167 discloses the use of an anti-foam agent. It therefore follows that claim 25 is independently patentable over the alleged combination of Mellikyan '090 in view of Billman '167 and patentable over the alleged combination for the same reasons as claim 1.

Claim 26 depends from claim 25 and provides concentration ranges for the anti-foam agent. The alleged combination does not include an anti-foam agent, much less any exemplary concentration ranges for an anti-foam agent. Thus, claim 26 is patentable over the alleged combination independently as well as because of its dependency on claims 1 and 25.

Claim 28, an independent claim, contains all the elements listed in claim 1 and further specifies the following composition ranges : 0.5 to 2.0 wt. % of the terpene hydrocarbon solvent, 4.0 to 7.0 wt. % of the one or more surfactants including at least one nonionic surfactant, 3.0 to 5.0 wt. % of the anti-soil component, 4.0 to 10.0 wt. % of the anti-stain component, and 70 to 85 wt. % of the water. Because claim 28 has all the elements of claim 1, claim 28 is patentable over the alleged combination of Mellikyan '090 in view of Billman '167 for at least the same reasons as claim 1. In addition, claim 28 patentably defines over the alleged combination of Mellikyan '090 in view of Billman '167 with recitation of the claimed composition ranges.

Claims 29-32 depend from claims 28 and define over the alleged combination of Mellikyan '090 in view of Billman '167 for the same reasons as claim 28. In addition, claim 30 incorporates an anti-foam agent into the carpet cleaning composition at a concentration of 0.01 to 0.10 wt. %. Neither Mellikyan '090 nor Billman '167 nor the alleged combination of Mellikyan '090 in view of Billman '167 discloses the use of an anti-foam agent, much less any exemplary concentration ranges for an anti-foam agent. It therefore follows that claim 30 is independently

Serial No. 10/707,764  
Filed: 01/09/04  
Page 21 of 21

Examiner: Charles I. Boyer  
Group Art Unit: 1751

patentable over the alleged combination of Mellikyan '090 in view of Billman '167 as well as because of its dependency from claim 28.

Claim 32 further defines over the alleged combination of Mellikyan '090 in view of Billman '167 in that it further narrows the concentrations of various components of the carpet cleaning composition. The arguments presented above with respect to claims 13 and 19 apply equally to claim 32. It therefore follows that claim 32 is patentable over the alleged combination.

Applicants have added new claims 33-42, which depend directly or indirectly from claim 1. These new claims distinguish over the prior art for at least the same reasons as set above with respect to claim 1 and should be allowed with claim 1.

In view of the foregoing remarks and amendments, it is submitted that all of the claims in this application are in condition for allowance. Early notification of allowability is respectfully requested. If the Examiner does not believe that all of the claims are in condition for allowance, the courtesy of a telephone interview is respectfully requested.

Respectfully submitted,

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